VOLUNTARY SELF DISCLOSURE CASES FY2007

(17 VSD Cases)

ORDER DATE	CASE NAME	CHARGES	SECTIONS VIOLATED	RESULT	PENALTY BREAKDOWN
09/26/07	In the Matter of Dental Zimmer Inc.	Exported dental equipment from the United States through the U.A.E. to Iran without the required U.S. Government authorization	764.2(a) [52]	Settlement Agreement - civil penalty of \$175,000; \$75,000 suspended	maximum fine was \$572,000 avg. 3365.38 fine was 30% of the maximum
09/24/07	In the Matter of Invitrogen Corporation	Exported and attempted to export HLA Tissue Typing Trays to Syria without the required licenses; made false statements on SEDs	764.2(a) [3] 764.2(c) [1] 764.2(g) [4]	Settlement Agreement - civil penalty of \$30,000	maximum fine was \$88,000 avg. 3750.00 fine was 34% of the maximum
09/21/07	In the Matter of Volvo Aero Services, LP	Exported various aircraft parts to various countries without the required licenses and with knowledge that violations would occur; failed to comply with reporting requirements; made false and misleading statements on SEDs	764.2(a) [46] 764.2(c) [24] 764.2(i) [8] 764.2(g) [15]	Settlement Agreement - civil penalty of \$204,600	maximum fine was \$1,023,000 avg. 2200.00 fine was 20% of the maximum
08/31/07	In the Matter of JSR Micro Inc.	Exported photoresists to Israel, Taiwan and Singapore without the required U.S. Government authorizations; made false or misleading representations, statements, or certifications on SEDs regarding the authorization of the exports	764.2(a) [45] 764.2(g) [45]	Settlement Agreement - civil penalty of \$270,000	maximum fine was \$990,000 avg. 3000.00 fine was 27% of the maximum

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07/16/07	In the Matter of Sercel, Inc.	Exported marine acoustic equipment to the People's Republic of China and Brazil without the required licenses	764.2(a) [2]	Settlement Agreement - civil penalty of \$8,000	maximum fine was \$22,000 avg. 4000.00 fine was 36% of the maximum
07/12/07	In the Matter of Plast-O- Matic Valves, Inc.	Exported thermoplastic valves and controls to various countries without the required licenses	764.2(a) [13]	Settlement Agreement - civil penalty of \$55,000	maximum fine was \$143,000 avg. 4230.77 fine was 38% of the maximum
07/09/07	In the Matter of Littelfuse, Inc.	Exported ceramic yarn to the Phillipines and the People's Republic of China without the required licenses; failed to comply with the reporting requirements	764.2(a) [62] 764.2(i) [5]	Settlement Agreement - civil penalty of \$221,100	maximum fine was \$737,000 avg. 3300.00 fine was 30% of the maximum
07/12/07	In the Matter of Plast-O- Matic Valves, Inc.	Exported thermoplastic valves and controls to various countries without the required licenses	764.2(a) [13]	Settlement Agreement - civil penalty of \$55,000	maximum fine was \$143,000 avg. 4230.77 fine was 38% of the maximum
07/16/07	In the Matter of Sercel, Inc.	Exported marine acoustic equipment to the People's Republic of China and Brazil without the required licenses	764.2(a) [2]	Settlement Agreement - civil penalty of \$8,000	maximum fine was \$22,000 avg. 4000.00 fine was 36% of the maximum

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05/08/07	In the Matter of Primavera Systems, Inc.	Exported computer software programs to Iran without the required authorizations; failed to comply with recordkeeping requirements	764.2(b) [6] 764.2(i) [6]	Settlement Agreement - civil penalty of \$55,000	maximum fine was \$132,000 avg. 4583.33 fine was 41% of the maximum
05/08/07	In the Matter of General Dyamics C4 Systems, Inc.	Exported encryption test equipment to Malaysia without the required license; made false or misleading representations on SED	764 2(a) [1] 764.2(g) [1]	Settlement Agreement - civil penalty of \$6,600	maximum fine was \$22,000 avg. 3300.00 fine was 30% of the maximum
04/20/07	In the Matter of Biospherical Instruments, Inc.	Exported a profiling radiometer system to Space Application Center in India, an organization on BIS's entity list without the required license and with knowledge that a violation would occur; made false representation to U.S. Government in connection with the preparation and submission of an export control document	764.2(a) [1] 764.2(e) [1] 764.2(g) [1]	Settlement Agreement - civil penalty of \$13,200	maximum fine was \$33,000 avg. 4400.00 fine was 40% of the maximum
03/13/07	In the Matter of ITT Corporation, Engineered Valves Group	Exported lined valves and valves bodies to China, Israel, Saudi Arabia and Taiwan without the required licenses; made false or misleading representations to the U.S. Government; failed to comply with reporting and recordkeeping requirements	764.2(a) [6] 764.2(g) [1] 764.2(i) [1]	Settlement Agreement - civil penalty of \$26,400	maximum fine was \$88,000 avg. 3771.43 fine was 30% of the maximum

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03/09/07	In the Matter of EMD Chemicals Inc.	Exported hydrofluoric acid to Guatemala without the required licenses; caused the reexport of industrial pigments to Iran without the required U.S. Government authorization	764.2(a) [9] 764.2(b) [3]	Settlement Agreement - civil penalty of \$44,000	maximum fine was \$132,000 avg. 3666.67 fine was 33% of the maximum
02/16/07	In the Matter of Magnetic Shield Corporation	Exported and attempted to export magnetic shielding materials to the Indira Gandhi Centre for Atomic Research (IGCAR), an organization on the Entity List without the required license; Failed to enter on license authority on SED	764.2(a) [2] 764.2(c) [1]	Settlement Agreement - civil penalty of \$19,000	maximum fine was \$33,000 avg. 6333.33 fine was 58% of the maximum
02/13/07	In the Matter of SCP Global Technologies, Inc.	Exported pumps and valves and spare parts to Taiwan and China without the required licenses and with knowledge that violations would occur	764.2(a) [30] 764.2(e) [15]	Settlement Agreement - civil penalty of \$264,000	maximum fine was \$660,000 avg. 5866.66 fine was 40% of the maximum
11/03/06	In the Matter of EPMedSystems, Inc.	Exported, reexported and conspired to export cardiac equipment to Iran without the required U.S. Government authorization and with knowledge that violations would occur; took actions to evade the requirements of the regulations; made false or misleading representations, statements, or certifications to BIS in a voluntary self disclosure	764.2(a) [6] 764.2(e) [6] 764.2(h) [4] 764.2(d) [2] 764.2(g) [5]	Settlement Agreement - civil penalty of \$244,000	maximum fine was \$253,000 avg. 10608.69 fine was 96% of the maximum